

ATTORNEYS AT LAW

125 BROAD STREET, 39TH FLOOR NEW YORK, NY 10004-2400

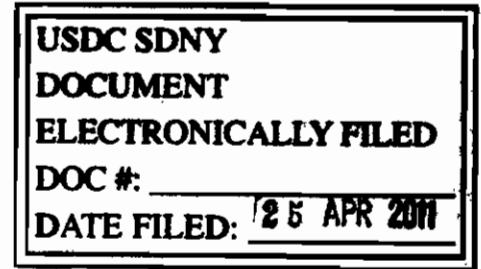
www.sedgwicklaw.com 212.422.0202 phone 212.422.0925 fax

**Sedgwick**<sub>LLP</sub>

John T. Seybert  
 (212) 898-4028  
 john.seybert@sdma.com

April 21, 2011

Via E-mail (crotty@nysdcourts.gov)  
 Hon. Paul A. Crotty, U.S.D.J.  
 United States District Court Judge  
 United States District Court For The Southern  
 District of New York  
 500 Pearl Street, Courtroom 20-C  
 New York, New York 10007



Re: *Iftikhar Ahmad v. Hartford Life And Accident Insurance Company*  
 Civ. Act. No. 10 cv 4545(PAC)(MHD)  
 File No.: 02489-000081

Dear Judge Crotty:

This office represents the defendant, Hartford Life And Accident Insurance Company ("Hartford"). We write on behalf of both parties to request an extension of the May 2, 2011 deadline to file motions for summary judgment. (Doc. No. 14).

By letter dated March 1, 2011, Plaintiff filed a letter motion to compel production of documents and an additional deposition of a Hartford witness. By letter dated March 4, 2011, Hartford timely opposed plaintiff's motion to compel. The Court has granted two previous extensions of time to file motions for summary judgment to allow the parties to complete discovery and to resolve these remaining discovery issues. (Doc. Nos. 11, 13 & 14).

✓ We respectfully request that the Court issue an order granting the parties an extension of time requiring the parties to file summary judgment motions on or before sixty days from the date the Court issues a decision and order on plaintiff's motion to compel. Counsel anticipate that sixty days will be sufficient time to complete the remaining discovery, if any, and to prepare motions for summary judgment.

Thank you for your consideration of this matter.

Respectfully submitted,

s/  
 John T. Seybert  
 Sedgwick LLP

cc: Scott M. Riemer, Esq. (via email)

NY/697493v1

SO ORDERED: 25 APR 2011

*Paul A. Crotty*  
 HON. PAULA A. CROTTY  
 UNITED STATES DISTRICT JUDGE

MEMO ENDORSED